

EXHIBIT 298

MARGARITA BENJAMIN 30(b)(6)
GOVT OF U.S. VI vs JP MORGAN CHASE

July 14, 2023

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1 UNITED STATES DISTRICT COURT FOR THE

2 SOUTHERN DISTRICT OF NEW YORK

3 CASE NUMBER: 22-CV-10904-JSR

4 ACTION FOR DAMAGES

5 GOVERNMENT OF THE UNITED STATES)
6 VIRGIN ISLANDS,)

7 Plaintiff,)

8 VS.)

9 JP MORGAN CHASE BANK, N.A.,)

10 Defendant.)

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14
15 VIDEO RECORDED DEPOSITION OF

16 MARGARITA BENJAMIN

17 FRIDAY, JULY 14, 2023

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20 REPORTED BY:

21 DENISE D. HARPER-FORDE
22 Certified Shorthand Reporter (CSR)
23 Certified RealTime Reporter (CRR)
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Notary Public (FLORIDA)

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1 that you are here to testify on behalf
2 of the Government of the U.S. Virgin
3 Islands?

4 A. Yes, I do.

5 Q. Okay. And the topic that
6 you're testifying about is the
7 Government's knowledge of Cecile de
8 Jongh's employment with an
9 Epstein-related organization. Do you
10 understand that?

11 A. Yes, I do.

12 Q. Can you tell me what the
13 Government's knowledge was in the time
14 period 2000 to 2019 about Ms. De
15 Jongh's employment?

16 ATTORNEY ACKERMAN: Object to
17 form. You can answer.

18 THE WITNESS: Right. I can --
19 I can speak for specific government
20 and not the overall government. But
21 it was widely known that Cecile de
22 Jongh was the Governor's wife. And in
23 particular, being a part of our
24 program, she would engage with several
25 different government agencies.

1 For instance, the Department
2 of Corporations, the Division of
3 Corporations, that's where they would
4 file their corporate annual reports.
5 And so it was known, of course by
6 record, she -- her -- she was listed
7 in those reports that she was also
8 working for the company.

9 Q. For which company?

10 A. For Financial Trust.

11 Q. All right. Which was
12 Mr. Epstein's company?

13 A. Mr. Epstein's company, yes.

14 Q. Okay. So you've mentioned one
15 --

16 A. Right.

17 Q. -- place, the Division of
18 Corporations.

19 What else?

20 A. Correct.

21 And she was also -- would be
22 also engaging with the Bureau of
23 Internal Revenue. And so coming in
24 contact with any individuals in the
25 Bureau of Internal Revenue as a

1 manager for the company and speaking
2 on behalf of any filings that were
3 done, they will be able to recognize
4 her.

5 It's important to note that
6 she was publicly known as the wife, of
7 course. Once he became Governor, she
8 was part of the swearing-in ceremony
9 that was advertised and was publicly
10 shown. Generally everyone knew that
11 she was his wife.

12 Those who would have come in
13 contact with her as a cause of doing
14 business would then recognize her as
15 his wife relating to the business of
16 Financial Trust.

17 Q. Okay. Any other government
18 agencies that you're in a position to
19 testify knew that Ms. --

20 A. Uh-huh.

21 Q. -- de Jongh was working for an
22 Epstein-related organization?

23 A. The Department of Labor.

24 Q. Uh-huh. How did the
25 Department of Labor know?

1 A. Well, our Chairman, Albert
2 Bryan, was also Commissioner at the
3 Department of Labor. And also during
4 the course of the certificate of
5 benefits, the term of certificate of
6 benefits, there was also Commissioner
7 Catherine Hendry, that was also at one
8 point working there, and other staff
9 members that would have engaged in the
10 reporting that was filed with that
11 agency.

12 Q. So the Department of Labor was
13 another portion of the Virgin Islands
14 Government that you are testifying
15 during the 2000 to 2019 time period
16 knew that Ms. de Jongh was not only
17 the -- that Ms. de Jongh was
18 working for an Epstein-affiliated
19 organization?

20 A. Yes.

21 Q. Okay.

22 A. And then in preparation for
23 today, I reviewed several documents
24 that attest to the fact that the
25 Department of Planning and Natural

1 Resources --

2 Q. Uh-huh.

3 A. -- was aware.

4 The now sitting Commissioner
5 was then the director of CZM. And so
6 in that role, he was aware of that.
7 The previous Commissioner, Dawn Henry,
8 was also aware that he was -- she was
9 working with that company.

10 Q. Okay. And is it your
11 testimony that from 2000 to 2019, that
12 the Virgin Islands DPNR was aware that
13 Ms. de Jongh was representing -- or
14 was working for an Epstein-related
15 company?

16 A. I would not say from 2000, but
17 somewhere within that period that they
18 would have been aware of it.

19 Q. Can you be more specific?

20 A. I would say probably around
21 2007 or so where they may have been
22 doing more major construction on the
23 island.

24 Q. Okay. You mentioned the EDC
25 director, Mr. Bryan, now the Governor.

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1 A. Uh-huh.

2 Q. But we haven't asked yet about
3 the EDC.

4 Did the EDC know from the 2-
5 -- from 2000 to 2019 that Ms. de Jongh
6 was working for an Epstein-affiliated
7 company?

8 A. Those in management, those
9 board members who were -- like Ms.
10 Lynn Millin at one --

11 COURT REPORTER: Ms.?

12 THE WITNESS: Lynn Millin was
13 also a Commissioner at the Department
14 of Planning and Natural Resources, and
15 she was a previous board member of the
16 Economic Development Commission.

17 (BY ATTORNEY NEIMAN):

18 Q. Okay. But to just -- let me
19 just put my question to you again.

20 A. Okay.

21 Q. From the time period 2000 to
22 2019, was the EDC of the Virgin
23 Islands aware that Ms. de
24 Jongh was working for an
25 Epstein-affiliated company?

1 A. Those employees that were --
2 had access specifically to the
3 employment records would have known at
4 that time. The CEO and in the
5 management team would have known at
6 that particular time.

7 Q. So, in fact, from --
8 throughout the EDC's relationship with
9 Mr. Epstein's companies, the senior
10 management of the EDC would have known
11 of Ms. de Jongh's affiliation with
12 those companies?

13 ATTORNEY ACKERMAN: Object to
14 form.

15 THE WITNESS: Yes. And it's
16 important to note that in and about
17 2012, everybody more or less knew
18 because there was an article that was
19 published that stated that she was
20 working with the Financial Trust,
21 Epstein's company.

22 (BY ATTORNEY NEIMAN):

23 Q. Okay. So certainly by 2012,
24 it was widely known within the
25 Government on the Virgin Islands that

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1 Ms. de Jongh was working for an
2 Epstein-affiliated company?

3 A. Yes.

4 Q. How about within the
5 Department of Justice of the Virgin
6 Islands? Did you do anything to
7 assess whether the Department of
8 Justice of the Virgin Islands was
9 aware that Ms. de Jongh was working
10 for an Epstein-affiliated company?

11 A. I have no direct knowledge
12 regarding the Department of Justice,
13 just what was read throughout the
14 depositions or throughout the
15 newspaper --

16 Q. Okay.

17 A. -- regarding what was
18 happening with the Department of
19 Justice.

20 Q. And what did you learn from
21 the newspapers?

22 A. That the then Attorney General
23 Frazer was in communication with
24 Cecile de Jongh regarding legislation
25 that was being passed for sexual